PSJ17 Exh 58

FAX COVER SHEET

DIVISION OF DRUG MARKETING, ADVERTISING AND COMMUNICATIONS
CENTER FOR DRUG EVALUATION AND RESEARCH
FOOD AND DRUG ADMINISTRATION

Date: November 29, 2005

To: Carol S. Marchione
Senior Director, Regulatory Affairs
Cephalon, Inc.
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Comments:

From: Michelle Safarik, MSPAS, PA-C
Regulatory Review Officer

No. of Pages without coversheet: 4

Phone: 301-796-1200
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DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville, MD 20857

TRANSMITTED BY FACSIMILE

Carol S. Marchione
Senior Director, Regulatory Affairs
Cephalon, Inc.
41 Moores Road
PO Box 4011
Frazer, PA 19355

Re: NDA 20-747
Actiq® (oral transmucosal fentanyl citrate)
MACMIS ID # 13858

Dear Ms. Marchione:

This letter responds to Cephalon, Inc.'s (Cephalon's) submission dated November 10, 2005, regarding a proposed Actiq (oral transmucosal fentanyl citrate) 2006 PDR® Pain Management Prescribing Guide (First Edition) (prescribing guide) (ACT 296). The proposed prescribing guide contains the following proposed promotional materials for Actiq:

- Pocket dosing guide (ACT 206)
- Booth panels based on ACT 244, 245, 247, and 249
- Journal ad (ACT 226)

The Division of Drug Marketing, Advertising, and Communications (DDMAC) have reviewed the proposed prescribing guide and offer the following comments. We note that the proposed prescribing guide includes promotional materials that have been previously commented on by DDMAC. However, we remind you that we evaluate proposed promotional materials in their entirety. Our comments should be applied to this and future promotional materials for Actiq that include the same or similar claims or representations.

General

DDMAC acknowledges that the statement, "Please see full prescribing information, including boxed warning, on page 1" appears throughout the proposed prescribing guide. We remind Cephalon that pursuant to the Act and implementing regulations (21 CFR 201.100(d)), labeling should be accompanied by the full prescribing information (PI) for Actiq.

Dear Healthcare Provider introductory letter

The Dear Healthcare Provider introductory letter includes claims such as the following:

- "Indeed, the assessment, successful treatment and management of pain have come to be viewed as key components of responsible care."

- "...for example, the need to understand, recognize and differentiate persistent pain from episodic or breakthrough pain."
- "Let's give them the control of pain they deserve."

These claims are presented in conjunction with the statements, "Cephalon is dedicated to developing and delivering innovative treatment options for the management of pain. ACTIQ® (oral transmucosal fentanyl citrate) is an example of this commitment and of our dedication in the field of pain medicine." The totality of this presentation is misleading because it implies that Actiq is useful in a broader range of conditions or patients than has been demonstrated by substantial evidence. According to the Indications and Usage section of the PI, "Actiq is indicated only for the management of breakthrough cancer pain in patients with malignancies who are **already receiving and who are tolerant to opioid therapy for their underlying persistent cancer pain**" (original emphasis).

Pocket dosing guide (ACT 206)

The proposed pocket dosing guide presents dosing information for Actiq and the statement, "Please see full prescribing information, including boxed warning, on page 1" at the bottom of each page. We recommend you present the full boxed warning for Actiq in the body of this proposed pocket dosing guide.

Because the proposed pocket dosing guide is directed to health care professionals, we recommend the language throughout this proposed piece be consistent with that audience.

Booth panels based on ACT 244, 245, 247, and 249

The proposed booth panels present a discussion of breakthrough cancer pain, three patient case studies, and the statement, "Please see full prescribing information, including boxed warning, on page 1" at the bottom of each page. We recommend you present the full boxed warning for Actiq in the body of these proposed booth panels.

Journal ad (ACT 226)

General

We note there are two footnotes in this proposed journal ad; we recommend including a list of corresponding references for the footnotes.

Overstatement of Efficacy

The proposed journal ad includes claims such as, **"When onset matters...ACTIQ® responds"** and **"Relief at hand"** (original emphasis). These claims are misleading because they overstate the efficacy of Actiq and imply that Actiq is guaranteed to provide adequate and effective response and pain relief for every patient every time the product is used, when such is not the case. DDMAC provided comments on same or similar claims or presentations in our letters dated November 10, 2005 and November 24, 2004.

Misleading Claim

The proposed journal ad includes claims such as, "Patients can use ACTIQ anywhere, as soon as they begin to feel breakthrough cancer pain." This claim is misleading because it implies that it is appropriate for patients to consume as many Actiq units as needed to control all episodes of breakthrough cancer pain per day, when such is the not the case. According to the Dosage and Administration section of the PI, "Once a successful dose has been found...patients should limit consumption to four or fewer units per day." We recommend prominently including this information for consistency with the PI. DDMAC provided comments on same or similar claims or presentations in our letters dated November 24, 2004 and September 29, 2004 and January 26, 1999.

If you have any questions, please direct them to me at the Food and Drug Administration, Center for Drug Evaluation and Research, Division of Drug Marketing, Advertising, and Communications, 5901-B Ammendale Road, Beltsville, MD 20705, or by facsimile at 301-796-9877. In all future correspondence regarding this matter, please refer to MACMIS ID # 13858 in addition to the NDA number. We remind you that only written communications are considered official.

Sincerely,

{See appended electronic signature page}

Michelle Safarik, MSPAS, PA-C
Regulatory Review Officer
Division of Drug Marketing, Advertising, and Communications

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/
Michelle Safarik
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